



Troy A. Bauer
Pipeline Safety and Compliance Manager
555 W. Fifth Street, ML11A6
Los Angeles, CA 90013
909-376-7208
TBauer@SoCalGas.com

June 10, 2020

Mr. Terence Eng
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Ave, 2nd Floor
San Francisco, CA 94102

Dear Mr. Eng:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112, Operation and Maintenance Inspection of Southern California Gas Company's (SoCalGas) Coastal Transmission Area from February 24, 2020 to March 13, 2020. SED conducted field inspections of pipeline facilities in the Ventura and Goleta Transmission districts within the Inspection Unit. SED's staff also reviewed the Operator Qualification program, which included field observation of randomly selected individuals performing covered tasks.

SED staff identified one notice of probable violation and two areas of concern. Attached are SoCalGas' written responses.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'T' and 'B' followed by a horizontal line.

Troy A. Bauer
Pipeline Safety and Compliance Manager

CC:
Mahmoud Intably, SED
Kan-Wai Tong, SED
Claudia Almengor, SED
Desmond Lew, SED

2020 SoCalGas Coastal Transmission
2/24/2020 to 3/13/2020

Notice of Probable Violations

- 1) During the field inspection on March 6, 2020, SED observed an above ground section of Line 1004 (MP L1004-8.35) in Santa Barbara had a miter joint with a deflection of 12 degrees. According to SoCalGas' records (as built drawing), the MP L1004-8.35 (Sycamore Creek) was replaced in 1994. The as-built drawing showed that the miter joint was designed with 12 degrees deflection and the pipeline operated at hoop stress of 37 (thirty-seven) percent of Specified Minimum Yield Strength (SMYS). Part 192.233(a) requires the miter joint to have a maximum of 3 degrees deflection if a pipeline operates at a pressure that produces hoop stress of 30 (thirty) percent or more of SYMS.

SED found SoCalGas' above ground section of L1004 operating at a pressure that produces a hoop stress of 37 (thirty-seven) percent or more of SMYS with the miter joint deflecting the steel pipe more than three degrees. Therefore, SED finds SoCalGas in violation of Title 49 CFR, Part 192, Section 192.233(a) for exceeding the maximum deflection allowed.

SoCalGas Response:

SoCalGas disagrees with SED's determination. As shown in the attached **Completion Sketch** (pages 4-6), the location on the segment shown as having a 12 degree deflection is identified as Item 2. Item 2 in the Bill of Materials is specified as a trimmed 45-degree elbow. A trimmed elbow does not have a hoop stress restriction as does a miter. SoCalGas has also attached the **Design Data Sheet** (page 7) and the **Miscellaneous Job Report** (pages 8-15) from the project files which further reinforce the trimmed elbows that were installed in 1994.

Concerns

- 2) During the field inspection on February 28, 2020, SED observed several line markers missing at the southeasterly intersection of East Fifth Street and South Rice Avenue in Ventura, CA. (Leak Survey Line 324, Work Order No.6268936). SED recommends that SoCalGas take corrective action to replace the missing line markers. SoCalGas took corrective action by replacing the missing line markers. No further follow up action is required.

SoCalGas Response:

As indicated in SED's letter, SoCalGas addressed the missing line markers on the same day of the inspection by installing the line markers on 02/28/2020.

3) Title 49 Code of Federal Regulations (CFR), Part 192, Section 192.605(a) states in part:

"General. Each operator shall prepare and follow for each pipeline a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. The manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted."

SoCalGas Gas Standard 223.0100 Leakage Surveys, Section 4.3.1.5 Special Surveys states:

"When the routine scheduled survey frequency are not considered adequate because of pipe condition, limited opportunity for gas to vent safely, or other reasons. When the special surveys will be ongoing and scheduled, efforts shall be made to identify the segment of pipe to be at the greater frequency in SAP and EGIS, and be scheduled as routine."

During the records review, SED observed several Special Leak Surveys not conducted by the required due date.

WO#	LOCATION	DUE DATE	COMPLETION DATE
6738994	1003-VENT	8/30/2018	9/22/2018
6729161	1004-VENT	8/30/2018	9/22/2018
6984087	1004-VENT	6/30/2019	7/19/2019
6729832	1005-VENT	8/30/2018	9/29/2018
7085276	1005-VENT	10/30/2019	11/26/2019
6396435	1011-VENT	6/30/2017	1/5/2018
6731235	1011-VENT	8/30/2018	9/29/2018
6738694	404-VENT	8/30/2018	9/15/2018
6729830	406-VENT	8/30/2018	9/15/2018

SED recommends SoCalGas take corrective measures to perform Special Leak Surveys according to their schedule.

SoCalGas Response:

SoCalGas agrees with SED's determination on the NTSB leak surveys. SoCalGas will issue a communication to the Transmission Districts to reinforce the unique timing of these surveys. SoCalGas did not find any abnormal operating conditions (AOCs) after the NTSB surveys were completed on these segments.

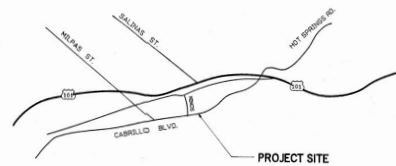


**BILL OF MATERIAL
GWO. 93396 GR**

ITEM NO.	MATERIAL DESCRIPTION & SIZE	QTY	UNIT	AMOUNT	UNIT	AMOUNT	UNIT	AMOUNT	UNIT
1	PIPE 16" 344 W X-80 WITH FBE COATING	1290	2580		325	FT			
2	ELL 16" 375 W X-80 45 DEGREE	1406	2813		2	EA			
3	BAND WELDING 16"X6" 375 Y-50	1119	2239		2	BT			
4	COUPLING 2" HALF SOND STL	3000	4500		4	EA			
5	PLUS 2" SOND STL SQUARE HEAD	3000	4500		4	EA			
6	COUPLING 1/2" HALF SOND STL	8000	9000		2	EA			
7	PLUS 1/2" SOND STL SQUARE HEAD	8000	9000		2	EA			
8	PRIMER POLYKYN 929				1	GAU			
9	TAPE POLYKYN 930				20	RL			
10	ELL 16" 375 W Y-60 45 DEGREE LR	1406	2813		1	EA			

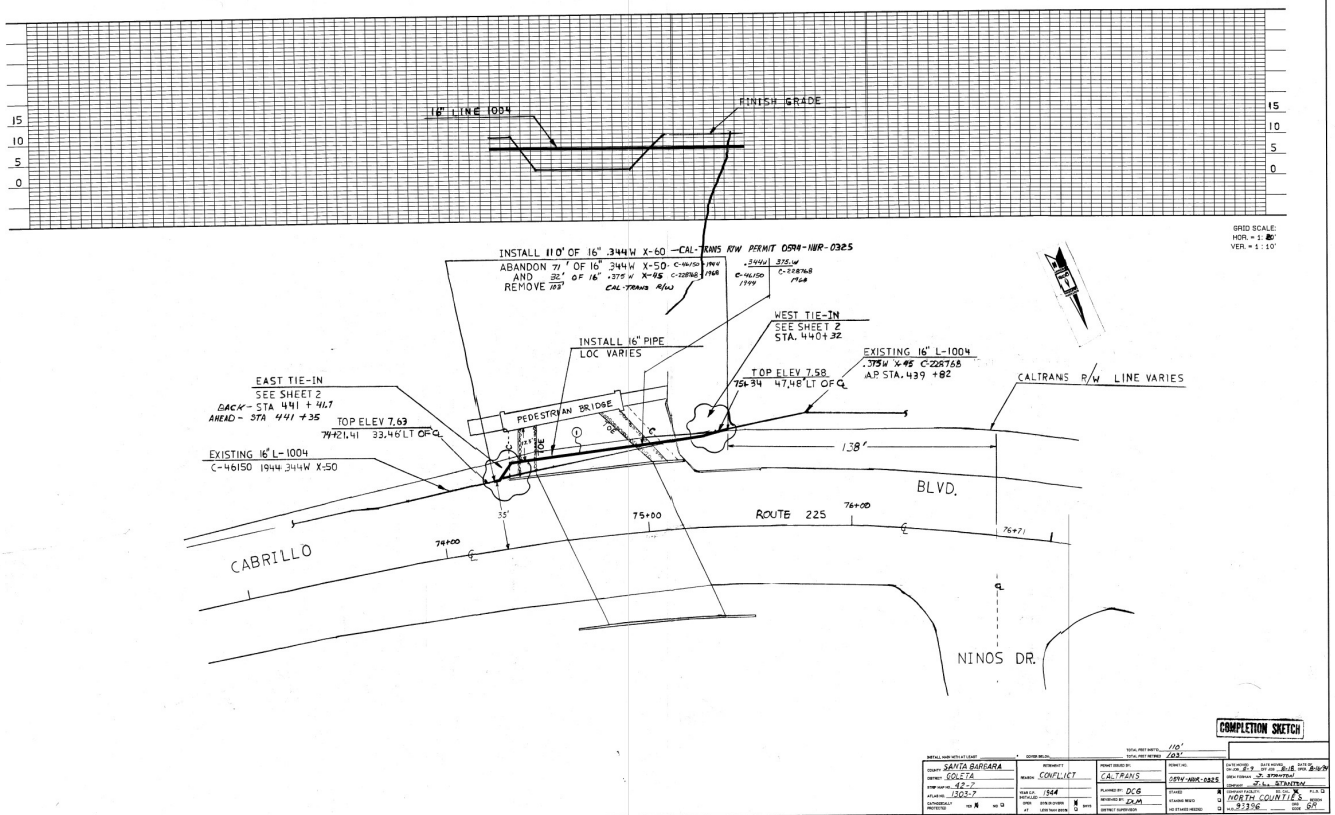
INSTALL APPROXIMATELY 130 FEET OF 16-INCH LINE 1004
IN THE CITY OF SANTA BARBARA
HWY 225, CABRILLO BLVD, SYCAMORE CREEK

NORTH COUNTIES REGION
GOLETA DISTRICT
GWO 93396

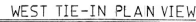


LOCATION MAP

CONFIDENTIAL-Exempt from Disclosure pursuant to Applicable State and Federal Law. PUC Section 583, GO 66-D, and D.17.09-023..



PLAN FILE NO.	NAME SECTION BY: DCG	CONSTR. SECTION BY: DCG	COMPL. SECTION BY: DCG	SHEET 2 OF 2
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P.S. 440+32

WEST TIE-IN PROFILE

COMPLETION SKETCH

[illegible]

SOUTHERN CALIFORNIA GAS COMPANY
DESIGN DATA SHEETSHEET 1 OF 1

JOB DESCRIPTION RELOCATION OF 16" LINE 1004 FOR BRIDGE IMPROVEMENT LENGTH 130 FT.
 LOCATION ON STATE HWY. 225 CABRILLO BLVD. (SYCAMORE CREEK) WORK ORDER 93396 GR
 DESIGN LEVEL 1000 PSIG = 44.6 % OF YP LOCATION CLASS 3 DESIGN FACTOR .5 MAOP OF PIPELINE OR NETWORK 1000 PSIG

A. PIPE & WELDING FITTINGS (WITH SPECIFIC WALL THICKNESS AND GRADE)

SIZE INCH	DESCRIPTION	SPECIFICATION (SMC)	WALL THICK. INCH	GRADE	YIELD PRESS. PSIG	DESIGN PRESS. PSIG
16	PIPE	40-55.3	.344	X-60	2580	1290
16	ELL	52-96	.375	Y-60	2813	1406
* 16	BAND	57-69	.375	Y-50	2239	1119

B. VALVES, REGULATORS & OTHER FITTINGS (WITH ANSI, WOG OR SIMILAR RATINGS)

SIZE INCH	DESCRIPTION	SPECIFICATION (SMC)	MAXIMUM TEST PRESS.-PSIG	DESIGN PRESS. PSIG
* 2	COUPLING-HALF, STL, SCRD 3000#	52-83	4500	3000
* 2	PLUG-STL, SCRD. SQ. HEAD 3000#	54-37	4500	3000
* 1/2	COUPLING-HALF, STL, SCRD 6000#	52-83	9000	6000
* 1/2	PLUG-STL, SCRD, SQ. HEAD 6000#	54-37	9000	6000

C. BRANCH CONNECTIONS, PRESSURE CONTROL FITTINGS & TAPS (EXCEEDING 2") SEE COMPANY PROCEDURE 182.89.M.3.

HEADER SIZE-INCH	GRADE	WALL THICK. INCH	DESIGN PRESS.-PSIG	BRANCH SIZE-INCH	GRADE	WALL THICK. INCH	TYPE OF REINFORCEMENT	GRADE	WALL THICK. INCH	DESIGN PRESS. BRANCH-PSIG

D. MITER BENDS

SIZE INCH	DEGREES DEFLECTION	DESIGN PRESS. PSIG

COMMENTS: *NOT PART OF TEST

E. QUALIFICATION

DESIGN PRESSURE (Least design pressure shown above in Section A, B, C, D)

1119 PSIGTEST MEDIUM WATER MINIMUM DURATION 8 HOURSACTUAL** 8 HOURSTEST PRESSURE (Minimum Req'd. 2322 psig, Maximum 2580 psig)ACTUAL** 2550 PSIG

MAXIMUM ALLOWABLE OPERATING PRESSURE (Lesser of Test Press./F* or Design Press)

** PSIG

*F = 1.25 for location class 1 & 2

*F = 1.50 for location class 3 & 4

**This information is filled in after pressure test.

DAVE GROVE

(805) 643-8249

D.L. MORGAN

8/19/94

PREPARED BY
Roy Groves
DIVISION APPROVAL

CO. PHONE NO.

INSTALLER'S SIGNATURE

DATE

DATE

ENGINEERING APPROVAL

DATE

FORM 3222-J 6-94

DIVISION CRIMINALS

DISTRICT GOLETA

SHEET 1 OF 1 SHEETS

DATE STARTED 8/10/94

DATE COMPLETED 8-16-94

DATE REPORTED 8/22/94

DESCRIBE THE UNIT OF EQUIPMENT, FACILITY, OR PLANT, AND STATE WHETHER IT WAS INSTALLED, REMOVED, RELOCATED, ALTERED, REPAIRED, OR ABANDONED. DESCRIPTION SHOULD INCLUDE SIZE, TYPE, AND LOCATION. UNDER THE DESCRIPTION SHOULD BE LISTED THE MAJOR ITEMS OF MATERIAL USED. IT IS NOT NECESSARY TO LIST MISCELLANEOUS FITTINGS 2" AND LESS IN SIZE WHICH ARE INCIDENTAL TO THE JOB UNLESS THE JOB IS COLLECTIBLE.

QUANTITY	MATERIAL USED
L-1004	SYCAMORE CREEK
101.8	PIPE, 16", .344W, X-60 W/FBE COATING
2	ELL, 16", .375W, Y-60, 45°, 3R
1	ELL, 16", .375W, Y-60, 45°, LR:
	CUT TO: 1-12° SEGMENT
	1-8° SEGMENT
2	BAND, WELDING, 16"X6", .375W, Y-50
4	COUPLING, 2" HALF SQR'D. STL. 3000#
4	PLUG, 2" SQR'D, STL, SQ. HEAD 3000#
2	COUPLING, 1/2" HALF SQR'D, STL 6000#
2	PLUG, 1/2" SQR'D, STL. SQ. HEAD 6000#
1 GAL	PRIMER, POLYKEN 929
20 RL	TAPE, POLYKEN 930
SIGNED	APPROVED

DIVISION N COUNTIES

DISTRICT GOLETA

 SHEET OF SHEETS

DATE STARTED 8/10/94

DATE COMPLETED 8-16-74

DATE REPORTED 8/22/74

DESCRIBE THE UNIT OF EQUIPMENT, FACILITY, OR PLANT, AND STATE WHETHER IT WAS INSTALLED, REMOVED, RELOCATED, ALTERED, REPAIRED, OR ABANDONED. DESCRIPTION SHOULD INCLUDE SIZE, TYPE, AND LOCATION. UNDER THE DESCRIPTION SHOULD BE LISTED THE MAJOR ITEMS OF MATERIAL USED. IT IS NOT NECESSARY TO LIST MISCELLANEOUS FITTINGS 2" AND LESS IN SIZE WHICH ARE INCIDENTAL TO THE JOB UNLESS THE JOB IS COLLECTIBLE.

QUANTITY	L-1004 SYCAMORE CREEK
	MATERIAL RETURNED
PIPE, 16", .344W, X 60 W/FRE COATING,	
25° ELL, 16" SEGMENT, .375W, Y-60	
NOTE: 2 SEGMENTS - 8° & 12° CUT FROM ORIGINAL 45° ELL.	
* 3 JOINTS:	7.7'
	28.9'
- 12.3'	
	48.9' TOTAL
SIGNED _____	APPROVED _____

DIVISION N. COUNTIES DISTRICT GOLETA SHEET 1 OF 1 SHEETS
 DATE STARTED 8/10/94 DATE COMPLETED 8/16/94 DATE REPORTED 8/22/94

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QUANTITY	MATERIAL RECEIVED
L-1004 SYCAMORE CREEK	
325.8	PIPE, 16", .344W, X60 W/FBE COATING
2	ELL, 16", .375W, Y-60, 45°, 3R
1	ELL, 16", .375W, Y-60, 45°, LR
2	BAND, WELDING, 16"x16", .375W, Y-50
4	COUPLING, 2" HALF SCD STL, 3000#
4	PLUG, 2" SCD STL SQ HEAD 3000#
2	COUPLING, 1/2" HALF SCD, STL 6000#
2	PLUG, 1/2" SCD, STL SQ.
1 GAL	PRIMER, POLYKEN 929
20 RL	TAPE, POLYKEN 930
SIGNED _____	APPROVED _____ <i>[Signature]</i>

DIVISION N. COUNTIES DISTRICT GOLETA SHEET 1 OF 1 SHEETS
DATE STARTED 8/10/94 DATE COMPLETED 8/16/94 DATE REPORTED 8/22/94

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[illegible]

DIVISION N. COUNTIES

DISTRICT GOLETA

1 SHEET 1 OF 1 SHEETS

DATE STARTED 8/10/94

DATE COMPLETED 8/16/94

DATE REPORTED 8/22/94

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[illegible]

W. O. No. 93396 GR

MISCELLANEOUS JOB REPORT

DIVISION NO. COUNTIES DISTRICT GOLETA SHEET 1 OF 3 SHEETS
 DATE STARTED 8/9/94 DATE COMPLETED 8/19/94 DATE REPORTED 8/19/94

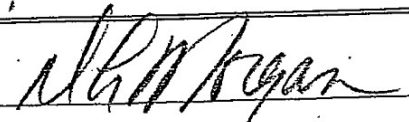
DESCRIBE BRIEFLY THE WORK PERFORMED

DESCRIBE THE UNIT OF EQUIPMENT, FACILITY, OR PLANT, AND STATE WHETHER IT WAS INSTALLED, REMOVED, RELOCATED, ALTERED, REPAIRED, OR ABANDONED. DESCRIPTION SHOULD INCLUDE SIZE, TYPE, AND LOCATION. UNDER THE DESCRIPTION SHOULD BE LISTED THE MAJOR ITEMS OF MATERIAL USED. IT IS NOT NECESSARY TO LIST MISCELLANEOUS FITTINGS 2" AND LESS IN SIZE WHICH ARE INCIDENTAL TO THE JOB UNLESS THE JOB IS COLLECTIBLE.

QUANTITY	
	8/9/94 - J.W. STANTON CONSTRUCTION MOVED ON JOB
	3 MEN - 570 DEERE BACKHOE - 650 CASE SIDE BOOM -
	COMPRESSOR. CONTRACTOR INSTALLED RENTAL FENCING
	AROUND JOB, SUBCONTRACTED PARKING LOT SAW CUT
	TO PENHALL. THEY RITMOLED TELEPHONE AND
	BEGAN EXCAVATING. THEY CUT 2" WATER LINE
	AND 3/4" IRRIGATION LINE. WATER WAS SHUT OFF
	AND S.B. PARKS DEPT. WAS NOTIFIED.
	8/10/94 - CONTRACTOR WITH SAME MEN AND
	EQUIPMENT CONTINUED EXCAVATION. ENCOUNTERED
	MASSIVE CONCRETE SEA WALL UNDER PARKING
	LOT PAVING. INCREASED SIZE OF EXCAVATION
	AND SUBCONTRACTED PENHALL TO BREAK OUT
	ENOUGH WALL FOR NEW PIPE ALIGNMENT.
	8/11/94 - CONTRACTOR WITH SAME MEN AND
	EQUIPMENT. GROVE CRANE ARRIVED. CONTRACTOR
	TRUCKED OUT THREE FABRICATED SECTIONS OF
	PIPE FROM GOLETA STORAGE FIELD AND
	COMPLETED EXCAVATIONS. ALL SPOIL WAS
	TRUCKED OFF PER CALTRANS INSPECTOR.
	CONTRACTOR PLACED AND SLIDDED UP 2
	SECTIONS OF PIPE. GAS COMPANY CREW
	WELDED SECTIONS TOGETHER.

SIGNED _____

APPROVED _____



W. O. No. 93396 G

MISCELLANEOUS JOB REPORT

DIVISION NO COUNTIES DISTRICT GOLETA SHEET 2 OF 3 SHEETS
 DATE STARTED 8/9/94 DATE COMPLETED 8/19/94 DATE REPORTED 8/19/94

DESCRIBE BRIEFLY THE WORK PERFORMED

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QUANTITY	
	8/12/94 - CONTRACTOR WITH SAME MEN AND EQUIPMENT PLACED 3RD SECTION WHICH WAS MISALIGNED DUE TO ERROR ON STRIP MAP. CONTRACTOR REMOVED SECTION AND COMPANY CREW BEGAN FABRICATING ADDITIONAL ELL SEGMENT TO CORRECT ALIGNMENT.
	8/13/94 - OVERTIME DAY (SATURDAY) 2 CONTRACTOR MEN TO ASSIST COMPANY CREW TO COMPLETE FABRICATION OF SECTION. HYDROSTATIC TEST OF SECTION WAS STARTED AT 3:45 AND ENDED AT 11:50 PM. SECTION WAS VENTED AND DRAINED INTO SYCAMORE CREEK.
	8/15/94 - BLOWDOWN DAY - CONTRACTOR BARRICADE SERVICE WAS HIRED TO CLOSE EAST BOUND LANE OF ORTEGA HILL ROAD SO THAT BLOW-DOWN SILENCER FROM SATCOY BASE COULD BE SUPPORTED. VALVE 8.06-0 CONTINUED TO LEAK DESPITE NUMEROUS EFFORTS TO FLUSH AND LUBE CAUSING EXTENDED DAY. STANTON WORKERS ASSISTED COMPANY CREWS FROM GOLETA AND VENTURA IN PREPARING FOR TIE-IN TOMORROW.
SIGNED	APPROVED <u>[Signature]</u>

MISCELLANEOUS JOB REPORT

W. O. No. 93396 ER

DIVISION No COUNTIES

PORT GOLETA
DISTRICT

SHEET 3 OF 3 SHEETS

DATE STARTED 8/9/94

DATE COMPLETED 8/19/94

DATE REPORTED 8/19/94

DESCRIBE BRIEFLY THE WORK PERFORMED

DESCRIBE THE UNIT OF EQUIPMENT, FACILITY, OR PLANT, AND STATE WHETHER IT WAS INSTALLED, REMOVED, RELOCATED, ALTERED, REPAIRED, OR ABANDONED. DESCRIPTION SHOULD INCLUDE SIZE, TYPE, AND LOCATION. UNDER THE DESCRIPTION SHOULD BE LISTED THE MAJOR ITEMS OF MATERIAL USED. IT IS NOT NECESSARY TO LIST MISCELLANEOUS FITTINGS 2" AND LESS IN SIZE WHICH ARE INCIDENTAL TO THE JOB UNLESS THE JOB IS COLLECTIBLE.

QUANTITY	
	8/16/94 - TIE-IN DAY - 3 CONTRACTORS ASSISTED GOLETA AND VENTURA CREWS WITH TIE-IN. LINE WAS PLACED BACK IN SERVICE AT 8:30 PM
	8/17/94 - 3 CONTRACTOR EMPLOYEES WRAPPED PIPE AND REMOVED OLD PIPE AND TRUCKED IT TO GOLETA STORAGE YARD. SAND WAS IMPORTED TO ONE FOOT ABOVE PIPE THEN EXCAVATION WAS SAND SLURRIED.
	8/18/94 - PARKING LOT WAS PAVED BY CONTRACTOR. STRIPING WILL BE DONE TOMORROW.
	NOTE - ALL WEEDS INCLUDING 6" AT ORTEGA BLOW DOWN WERE X-RAYED BY WESTEX. — 9 ADDITIONAL PARKING SPACES WERE PURCHASED FROM SANTA BARBARA CITY FOR A STAGING AREA
SIGNED _____	APPROVED _____ <i>W. Ortega</i>